

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

CARSON BLOCK,

Plaintiff,

v.

KEVIN R. BARNES,

Defendant.

Civil Action No. 2:23-cv-02483-MMB

UNOPPOSED MOTION FOR EXTENSION OF TIME

Plaintiff Carson Block hereby moves pursuant to Federal Rule of Civil Procedure 6(b)(1) for an Order extending the time to file a response to Defendant Kevin R. Barnes's Motion to Dismiss or, in the Alternative, to Transfer (ECF No. 8) up to and including October 18, 2023. In support of this Motion, Mr. Block states:

1. On June 28, 2023, Mr. Block initiated the present action by filing a Complaint in this Court (ECF No. 1).

2. After some delay in the effectuation of service of process, Defendant elected to waive service on July 19, 2023, giving him until September 18, 2023, to respond to the Complaint. *See* ECF No. 7.

3. On September 18, 2023, Defendant filed a Motion to Dismiss or, in the Alternative, to Transfer (ECF No. 8) (the "Motion").

4. On September 21, 2023, counsel for Mr. Block sent an email to counsel for Defendant, seeking Defendant's position on an extension of the time for Mr. Block to respond to the Motion up to and including October 18, 2023.

5. Counsel for Defendant responded on September 21, 2023, stating that Defendant does not oppose the request.

6. Due to the press of several other matters and the intervening Jewish holidays, Mr. Block now respectfully seeks this Court's approval of an extension of the time to file a response to the Motion up to and including October 18, 2023.

7. Currently, Mr. Block's response to the Motion is due on October 2, 2023. No prior extensions of this deadline have been requested.

8. A proposed form of order is attached hereto.

WHEREFORE, for the foregoing reasons, Plaintiff Carson Block respectfully requests that the Court grant this Unopposed Motion for Extension of Time and extend Mr. Block's time to file a response to Defendant Kevin R. Barnes's Motion to Dismiss or, in the Alternative, to Transfer up to and including October 18, 2023.

Respectfully submitted,

HANGLEY ARONCHICK SEGAL PUDLIN
& SCHILLER

September 25, 2023

By: /s/ Michael J. Masciandaro
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[PROPOSED] ORDER

AND NOW this ____ day of _____, 2023, upon consideration of Plaintiff Carson Block's Unopposed Motion for Extension of Time to File Response to Defendant Kevin R. Barnes's Motion to Dismiss or, in the Alternative, to Transfer (ECF No. 8), it is hereby ORDERED that the motion is GRANTED.

Plaintiff Carson Block's time to file a response to Defendant Kevin R. Barnes's Motion to Dismiss or, in the Alternative, to Transfer (ECF No. 8) is extended up to and including October 18, 2023.

BY THE COURT:

Michael M. Baylson
United States District Judge

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CERTIFICATE OF UNCONTESTED MOTION

I, John S. Summers, hereby certify pursuant to Local Civil Rule 7.1(b) that the foregoing Motion for Extension of Time is uncontested. Counsel for Defendant Kevin R. Barnes has stated that Defendant does not oppose Plaintiff Carson R. Block's request for an extension of the time to respond to Defendant's Motion to Dismiss or, in the Alternative, to Transfer (ECF No. 8) up to and including October 18, 2023.

Dated: September 24, 2023

/s/ John S. Summers

John S. Summers

CERTIFICATE OF SERVICE

I, Michael J. Masciandaro, certify that on September 25, 2023, I caused the foregoing Unopposed Motion for Extension of Time to be filed with the Clerk of the Court using the CM/ECF system, which will send notification to all counsel of record.

/s/ Michael J. Masciandaro
Michael J. Masciandaro